

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civ. Action No. 14-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**NOTICE OF JOINDER BY THE LOCKS LAW FIRM TO THE MOTION
OF CO-LEAD CLASS COUNSEL ANAPOL WEISS TO COMPEL
REIMBURSEMENT TO ALL CLASS COUNSEL FOR CONTRIBUTIONS
TO COMMON BENEFIT EXPENSES
AND TO COMPEL THE ESTABLISHMENT OF THE EDUCATION FUND**

Undersigned Class Counsel the Locks Law Firm respectfully submits this Notice of Joinder adopting, supporting, and joining the motion of co-lead class counsel Anapol Weiss to compel the Claims Administrator to reimburse class counsel out of the Attorneys' Fees QSF fund the monies class counsel contributed to the common benefit expenses (as submitted for

reimbursement) and for the entry of an order establishing the Education Fund per the Settlement Agreement. *See* Document No. 9807.

The basis for this Joinder is as follows:

1. The Locks Law Firm agrees with co-lead class counsel Anapol Weiss that expenses totaling approximately \$5.7 million should be reimbursed to class counsel. The precise figures for reimbursement derive from a Fee Petition filed by co-lead class counsel Seeger Weiss LLP, on Feb. 13, 2017 (ECF No. 7151). A subsequent table that summarizes the expenses and the names of the law firms participating was compiled in Document 7205-1 and filed with the Court on February 27, 2017. That table is attached here as Exhibit A. For clarification purposes, the reimbursement amounts appear in the column labeled Expenses, totaling \$5,682,779.38. Many of these expenses date back to 2012.

2. The Locks Law Firm agrees with Anapol Weiss that the establishment of the Education Fund, as required by the Settlement Agreement, should be expedited and that the Court should intervene to ensure this happens.

For the forgoing reasons, Class Counsel the Locks Law Firm respectfully joins the motion filed by Anapol Weiss to compel payment of submitted expenses to class counsel and to establish the Education Fund in an appropriate and expedited manner.

Respectfully submitted,

/s/ Gene Locks

Gene Locks

David D. Langfitt

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Exhibit A

NFL Concussion Case CA. No. 2:12-md-2323-AB Attorney Fee and Expense Report
 Compiled from Co-Lead Class Counsel's Fee Petition dated Feb. 13, 2017 (ECF No. 7151)

	Attorney Name	Firm Name	Hours	Fee Amount	Expenses	Total Fees + Expenses
1	Christopher A. Seeger	Seeger Weiss LLP	21,044.06	\$ 18,124,869.10	\$ 1,498,690.99	\$ 19,623,560.09
2	Arnold Levin	Levine Sedran & Berman	5,021.25	\$ 6,031,806.25	\$ 519,893.97	\$ 6,551,700.22
3	Gene Locks	Locks Law Firm	4,243.00	\$ 3,084,500.00	\$ 639,160.00	\$ 3,723,660.00
4	Steven C. Marks	Podhurst Orseck, PA	4,510.80	\$ 3,005,744.50	\$ 771,127.79	\$ 3,776,872.29
5	Dianne M. Nast	NastLaw LLC	1,211.75	\$ 765,060.25	\$ 117,138.64	\$ 882,198.89
6	Sol H. Weiss	Anapol Weiss	4,241.22	\$ 1,857,436.00	\$ 1,031,971.55	\$ 2,889,407.55
7	Garrett D. Blanchfield Jr.	Reinhardt Wendorf & Blanc	23.10	\$ 14,899.50	\$ 1,480.57	\$ 16,380.07
8	William G. Caldes	Spector Roseman Kodroff & Willis	74.40	\$ 51,708.00	\$ 1,460.92	\$ 53,168.92
9	Leonard A. Davis	Herman, Herman & Katz	136.30	\$ 89,660.00	\$ -	\$ 89,660.00
10	James R. Dugan II	The Dugan Law Firm	293.90	\$ 188,340.50	\$ 118,880.16	\$ 307,220.66
11	Daniel C. Girard	Giard Gibbs LLP	373.10	\$ 279,489.00	\$ 8,300.11	\$ 287,789.11
12	Thomas V. Girardi	Girardi Keese	626.80	\$ 472,370.00	\$ 5,509.15	\$ 477,879.15
13	Bruce A. Hagen	Hagen, Roskopf & Earle, LLC	540.80	\$ 324,480.00	\$ 16,998.08	\$ 341,478.08
14	Samuel Issacharoff	Issacharoff/Estlund	801.75	\$ 800,512.50	\$ 7,302.22	\$ 807,814.72
15	Richard Lewis	Hausfeld LLP	1,281.80	\$ 763,917.50	\$ 165,468.47	\$ 929,385.97
16	Jason E. Luckasevic	Goldberg, Persky & White, P.C.	500.60	\$ 262,860.00	\$ 11,823.78	\$ 274,683.78
17	Derriel C. McCorvey	McCorvey Law, LLC	331.30	\$ 198,780.00	\$ 104,155.65	\$ 302,935.65
18	Mike McGlamry	Pope McGlamry	1,274.90	\$ 829,030.00	\$ 125,137.01	\$ 954,167.01
19	Craig R. Mitnick	Mitnick Law Office, LLC	1,198.15	\$ 898,612.50	\$ 83,082.20	\$ 981,694.70
20	David A. Rosen	Rose, Klein & Marias LLP	243.03	\$ 157,969.50	\$ 112,168.64	\$ 270,138.14
21	Frederick Schnek	Casey, Gerry, Schenk LLP	417.40	\$ 333,920.00	\$ 86,651.72	\$ 420,571.72
22	Anthony Tarricone	Kreindler & Kreindler LLP	1,573.00	\$ 1,258,400.00	\$ 120,832.04	\$ 1,379,232.04
23	Charles S. Zimmerman	Zimmerman Reed LLP	1,106.50	\$ 885,907.25	\$ 135,545.72	\$ 1,021,452.97
	Total		51,068.91	\$40,680,272.35	\$5,682,779.38	\$46,363,051.73

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice was served on this date via the Electronic Filing System on all counsel of record in Case No. 1:12-md-02323-AB, MDL No. 2323.

DATE: April 3, 2018

By: /s/Gene Locks
Gene Locks, Class Counsel